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By: Commission Internet Comment Form

Florence E. Harmon, Acting Secretary Securities and Exchange Commission 100 F Street, NE Washington DC 20549-1090

Re: Interactive Data for Mutual Fund Risk/Return Summary, Release Nos. 33-8929, 34-57942, 39-2457; IC-28298; File No. S7-12-08

Dear Ms. Harmon:

We appreciate the opportunity to respond to the Securities and Exchange Commission's proposed rule *Interactive Data for Mutual Fund Risk/Return Summary*.

We strongly support the Commission's proposal and have provided our comments and suggestions on the included exhibit.

Most notably, we believe that the effectiveness of the proposal should be phased in over a multi-year period based on a mutual fund's net assets. This phase in would allow for the further development of software to be used by the investing public, as well as provide adequate time for mutual funds to fully analyze their business processes involving all compliance reporting such that significant increases in controls and efficiency could be achieved. These increases would save costs presently borne by both the mutual fund's shareholders and its management company.

We would be pleased to discuss our comments and to answer any questions the Commission or staff may have. Please do not hesitate to contact me directly at 201.508.6030 regarding our submission.

Sincerely,

Brian C. Essman

President and Chief Executive Officer